

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	Case No. 19-md-2875 MDL No. 2875 Honorable Renée Marie Bumb, Chief District Judge Special Master Judge Thomas Vanaskie
This Document Relates to All Losartan and Irbesartan Actions	

**JOINT MOTION FOR ENTRY OF STIPULATION AND ORDER ON
MOTION TO DISMISS REGARDING PLAINTIFFS' MASTER
COMPLAINTS FOR LOSARTAN AND IRBESARTAN**

NOW come counsel for Plaintiffs and Defendants named in Plaintiffs' Master Losartan Medical Monitoring Complaint (681), Master Losartan Personal Injury Complaint (682), Master Irbesartan Personal Injury Complaint (683), Master First Amended Losartan Economic Loss Complaint (751), and Master First Amended Irbesartan Economic Loss Complaint (752), and jointly request that the Court enter the proposed Stipulation and Order on Motions to Dismiss regarding the aforementioned Plaintiffs' Master Complaints for Losartan and Irbesartan, attached hereto as Exhibit A. As set forth in the proposed Stipulation and Order on Motions to Dismiss, in order to conserve the Court and the parties' resources and for efficiency's sake, the parties seek to avoid briefing motions to dismiss on Plaintiffs'

Master Losartan and Irbesartan Complaints that would be substantially similar to the prior briefing on the motions to dismiss filed by Defendants as to Plaintiffs' Master Valsartan Complaints, and which would likely generate substantially similar orders and opinions from this Court as to Plaintiffs' claims regarding Losartan and Irbesartan. Therefore, without waiving and while specifically preserving all of their respective appellate rights as to each Losartan and Irbesartan claim, defense, motion, ruling, issue and argument, the parties jointly request that the Court enter the attached proposed Stipulation and Order on Motions to Dismiss Plaintiffs' Master Complaints for Losartan and Irbesartan.

Respectfully submitted,

**MAZIE, SLATER, KATZ &
FREEMAN, LLC**

/s/ Adam Slater

Adam Slater
103 Eisenhower Pkwy, 2nd Flr.
Roseland, NJ 07068
Tel: (973) 228-9898
aslater@mazieslater.com

*Attorneys for Plaintiffs, Plaintiffs'
Liaison Counsel to the Court and the
Defendants*

**SKADDEN, ARPS, SLATE,
MEAGHER & FLOM LLP**

/s/ Jessica Davidson

Jessica Davidson
Allison M. Brown
One Manhattan West
New York, NY 10001
Tel: (212) 735-3222
jessica.davidson@skadden.com
allison.brown@skadden.com

Nina R. Rose
1440 New York Avenue, N.W.
Washington, D.C. 20005
Tel: (202) 371-7000
nina.rose@skadden.com

*Member of Defendants' Executive
Committee, Defendants' Liaison
Counsel, and Attorneys for Zhejiang
Huahai Pharmaceutical Co., Ltd.,
Huahai U.S., Inc., Princeton
Pharmaceutical Inc., and Solco
Healthcare U.S., LLC*

**NIGH GOLDENBERG RASO &
VAUGHN, PLLC**

/s/ Daniel Nigh

Daniel Nigh
14 Ridge Square NW Third Floor
Washington, D.C. 20016
Tel: (850) 600-8090
dnigh@nighgoldenberg.com

Attorneys for Plaintiffs

GREENBERG TRAURIG, LLP

/s/ Victoria Davis Lockard

Victoria Davis Lockard
Lori G. Cohen
Steven M. Harkins
Terminus 200
3333 Piedmont Road, N.E., Suite 2500
Atlanta, GA 30305
Tel: (678) 553-2100
CohenL@gtlaw.com
LockardV@gtlaw.com
HarkinsS@gtlaw.com

Gregory E. Ostfeld
77 West Wacker Drive, Suite 3100
Chicago, IL 60601
Tel: (312) 456-8400
ostfeldg@gtlaw.com

*Member of Defendants' Executive
Committee and Counsel for Teva
Pharmaceuticals USA, Inc., Teva
Pharmaceutical Industries Ltd., Actavis
Pharma, Inc., and Actavis LLC*

HONIK LLC

/s/ Ruben Honik

Ruben Honik
1515 Market Street, Suite 1100
Philadelphia, PA 19102
Tel: (267) 435-1300
ruben@honiklaw.com

Attorneys for Plaintiffs

UB GREENSFELDER LLP

/s/ Jeffrey D. Geoppinger

Jeffrey D. Geoppinger
312 Walnut Street, Suite 1400
Cincinnati, OH 45202
Tel: (513) 698-5038
jgeoppinger@ubglaw.com

*Member of Defendants' Executive
Committee, Liaison Counsel for
Wholesaler Defendants, and Counsel
for AmerisourceBergen Corporation
(n/k/a Cencora, Inc.)*

KANNER & WHITELEY, LLC

/s/ Conlee S. Whiteley

Conlee S. Whiteley
David J. Stanoch
701 Camp Street
New Orleans, LA 70130
Tel: (504) 524-5777
c.whiteley@kanner-law.com

*Attorneys for Plaintiffs, Plaintiffs'
Liaison Counsel*

/s/ Kara M. Kapke

Sarah E. Johnston
Kristen L. Richer
2029 Century Park East, Suite 300
Los Angeles, CA 90067
Tel: (310) 284-3798
Sarah.Johnston@btlaw.com
Kristen.Richer@btlaw.com

Kara M. Kapke
11 S Meridian St.
Indianapolis, IN 46204
Tel: (317) 236-1313
kara.kapke@btlaw.com

*Member of Defendants' Executive
Committee, Liaison Counsel for
Retailer Defendants, and Attorneys for
CVS Pharmacy, Inc. (incorrectly named
as CVS Health Corporation), Rite Aid
Corporation, Walgreen Co.
and Walmart Inc.*

CERTIFICATE OF SERVICE

I hereby certify that I today caused to be served a copy of the foregoing on
August 8, 2024, via ECF.

/s/ Jeffrey D. Geoppinger

Jeffrey D. Geoppinger